## UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

BRAD AMOS,	)
Plaintiff, v.	) Case No. 3:21-cv-00923
	) District Judge Richardson
	) Magistrate Judge Holmes
THE LAMPO GROUP, LLC,	Jury Demand
Defendant.	)

## DEFENDANT'S RESPONSE IN OPPOSITION TO PLAINTIFF'S MOTION IN LIMINE NO. 10

Defendant, The Lampo Group, LLC, responds in opposition to the mischaracterizations in Plaintiff's Motion in Limine No. 10 and to the unilateral request that only Plaintiff's counsel be protected from disparaging remarks at trial. Throughout this litigation, Defendant's counsel has not made a single extra-judicial disparaging remark about Plaintiff or his attorneys. Only Plaintiff's counsel has done that. *See* (Doc. 225).

As for statements made in pleadings and discovery, Defendant has (1) defended itself, its counsel, and its employees against unfounded accusations by Plaintiff and his counsel and (2) filed a motion for attorneys' fees when the entire case was dismissed pursuant to FRCP 12(b)(6). Plaintiff's counsel apparently wants to be free to attack Defendant and its counsel, but he accuses Defendant's counsel of bullying when we respond.

Defendant's counsel wants nothing more than to be rid of Plaintiff's constant distractions from the merits of his case. Defendant wholly supports a limiting instruction preventing Plaintiff and his attorney from personally attacking Defendant and Defendant's counsel in front of the jury.

<sup>&</sup>lt;sup>1</sup> Defendant and Mr. Ramsey intend to renew this motion as to the numerous claims that have been dismissed in this lawsuit.

Defendant has no objection to such instruction being applied to its attorneys who have no intention of presenting anything to the jury other than the facts of this case.

Respectfully submitted,

/s/Leslie Goff Sanders Leslie Goff Sanders (TN #18973) Daniel Crowell (TN #31485) Eric Lyons (TN #36105) Stephen Stovall (TN #37002) Molli Guinn (TN #41258) Barton LLP 611 Commerce Street **Suite 2911** Nashville, TN 37203 Telephone: (615) 340-6790 lsanders@bartonesq.com dcrowell@bartonesq.com elyons@bartonesq.com sstovall@bartonesq.com mguinn@bartonesq.com

Attorneys for Defendant

## **CERTIFICATE OF SERVICE**

I certify that, on June 30, 2025, I filed the foregoing document via the Court's electronic

filing system, which will automatically notify and send a copy to:

Jonathan Street
Zachary Brown
Brandon Hall
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EMPLOYMENT & COMMERCE LAW GROUP

Attorneys for Plaintiff

/s/Leslie Goff Sanders
Leslie Goff Sanders (TN #18973)
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